



# EARTH ISLAND INSTITUTE

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July 2, 1999

Dockets Management Branch (HFA-305)  
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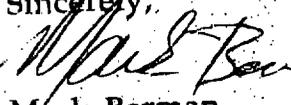
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To Whom it May Concern,

Food and Drug Administration guidelines issued April 6, 1999, instituted a de facto ban on non-human primate xenografts because they would expose patients and the public to "significant infectious disease risk" (Docket No. 99D-0557). But the guidelines failed to address dangers with other species. Transgenic pigs are considered the source animals of choice for xenotransplants despite the existence of over 25 diseases in pigs that can infect humans. Pigs are not safer than non-human primates: witness swine influenza, the porcine endogenous retroviruses, paramyxovirus, and the new "Nipah" virus in Malaysia that infected over 250 humans, killed 103, and led to the slaughter of over 1 million pigs.

There are safer, more cost-effective, and humane alternatives to xenotransplantation that are not being explored by regulatory agencies. These include investing heavily in preventive medicines to reduce the need for transplants of all kinds. On behalf of Earth Island Institute and our more than 100,000 members and supporters, I write to urge you to ban xenotransplantation from all non-human species. Thank you for the opportunity to comment.

Sincerely,

  
 Mark Berman  
 Program Associate

International Marine Mammal Project of Earth Island Institute

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